

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
Miami Division**

Case No.: 1:25-CV-23232-DPG

PRESIDENT DONALD J. TRUMP, an individual,

Plaintiff,

v.

DOW JONES & COMPANY, INC. d/b/a THE WALL STREET JOURNAL, a Delaware corporation, NEWS CORPORATION, a Delaware corporation, KEITH RUPERT MURDOCH, an individual, ROBERT THOMSON, an individual, KHADEEJA SAFDAR, an individual, and JOSEPH PALAZZOLO, an individual,

Defendants.

**DECLARATION OF KATHERINE M. BOLGER
IN SUPPORT OF DEFENDANTS' MOTION TO DISMISS**

I, Katherine M. Bolger, Esq. declare as follows:

1. I am a partner at Davis Wright Tremaine LLP, co-counsel to Defendants Dow Jones & Company, Inc. d/b/a *The Wall Street Journal*, News Corporation, Keith Rupert Murdoch, Robert Thomson, Khadeeja Safdar, and Joseph Palazzolo. I am admitted *pro hac vice* in the above-captioned matter.

2. I make this declaration in order to annex exhibits relied upon in Defendants' concurrently-filed Motion to Dismiss.

3. Annexed hereto as **Exhibit 1** is a true and correct copy of the article published by *The Wall Street Journal* on July 17, 2025 entitled "Jeffrey Epstein's Friends Sent Him Bawdy Letters for a 50th Birthday Album. One Was From Donald Trump.," which is available at the URL,

<https://www.wsj.com/politics/trump-jeffrey-epstein-birthday-letter-we-have-certain-things-in-common-f918d796> (the “Article”).

4. Annexed hereto as **Exhibit 2** is a true and correct copy of the subpoena issued to the estate of Jeffrey Epstein on August 25, 2025 by the United States House of Representatives Committee on Oversight and Government Reform (the “House Oversight Committee”), which is available at the URL, <https://oversight.house.gov/wp-content/uploads/2025/08/2025.08.25-Subpoena-and-Schedule-to-Epstein-Estate.pdf>.

5. Annexed hereto as **Exhibit 3** is a true and correct copy of the press release issued by the House Oversight Committee on September 8, 2025 entitled, “Oversight Committee Releases Records Provided by the Epstein Estate, Chairman Comer Provides Statement,” which is available at the URL, <https://oversight.house.gov/release/oversight-committee-releases-records-provided-by-the-epstein-estate-chairman-comer-provides-statement/>.

6. Annexed hereto as **Exhibit 4** is a true and correct copy of a 238-page document entitled “The First Fifty Years” with Bates stamps HOUSE_OVERSIGHT_000001-HOUSE_OVERSIGHT_000238, produced by the estate of Jeffrey Epstein in response to Request No. 1 in the House Oversight Committee subpoena¹ and subsequently released by the House Oversight Committee on September 8, 2025. In its press release (Exhibit 3), the House Oversight Committee provided links to download the 238-page document from Google Drive, which is available at the URL,

https://drive.google.com/file/d/1rR1BzSxbCkV6LGWTUJuIoze_xSvzOfUD/view; and from Dropbox, which is available at the URL,

¹ This request sought “All entries contained within the reported leather-bound book compiled by Ms. Ghislaine Maxwell for Mr. Jeffrey Epstein’s 50th birthday.”

<https://www.dropbox.com/scl/fo/azl4abiwwixtvezmz0617/ANVZACgh4aPQ-TexCKi0FDw?dl=0&e=2&preview=Request+No.+1.pdf&rlkey=aqg68si6y246f2b15kro9zmqh&st=7nh3wzuq>.

7. Annexed hereto as **Exhibit 5** is a true and correct copy of a page with the Bates stamp HOUSE_OVERSIGHT_000165, which appears in the 238-page document produced by the estate of Jeffrey Epstein in response to Request No. 1 in the House Oversight Committee subpoena and released by the House Oversight Committee on September 8, 2025 (Exhibit 4).

8. Annexed hereto as **Exhibit 6** is a true and correct copy of the article published by *New York* magazine on October 28, 2002, entitled “Jeffrey Epstein: International Moneyman of Mystery,” which is available at the URL, https://nymag.com/nymetro/news/people/n_7912/.

9. Annexed hereto as **Exhibit 7** is a true and correct copy of the transcripts published by the *Los Angeles Times* entitled “Transcripts: What the mics caught Donald Trump saying in 2005 and what he said in his taped apology,” which are available at the URL, <https://www.latimes.com/politics/la-na-pol-trump-bush-transcript-20161007-snap-htmlstory.html>.

10. Annexed hereto as **Exhibit 8** is a true and correct copy of an Internet Archive Wayback Machine capture of the statement released by Donald J. Trump on October 7, 2016, entitled “Statement from Donald J. Trump,” which is available at the URL, <https://web.archive.org/web/20170429192721/https://www.donaldjtrump.com/press-releases/statement-from-donald-j.-trump>.

11. Annexed hereto as **Exhibit 9** is a true and correct copy of the article published by *The Wall Street Journal* on October 7, 2016, entitled “Donald Trump Says His Lewd Comments About Women in Unearthed Video Were ‘Locker Room Banter,’” which is available at the URL, <https://www.wsj.com/articles/BL-WB-65871>.

12. Annexed hereto as **Exhibit 10** is a true and correct copy of the article published by *Politico* on August 14, 2015 entitled “The 199 Most Donald Trump Things Donald Trump Has Ever Said,” which is available at the URL, <https://www.politico.com/magazine/story/2015/08/the-absolute-trumpest-121328/>.

13. Annexed hereto as **Exhibit 11** is a true and correct copy of the article published by *Esquire* in May 1991 entitled “Donald Trump Gets Small,” which is available at the URL, <https://classic.esquire.com/article/1991/5/1/donald-trump-gets-small>.

14. Annexed hereto as **Exhibit 12** is a true and correct copy of the transcript of an October 9, 2006 interview with Plaintiff that aired on “Larry King Live” on CNN, which is available at the URL, <https://transcripts.cnn.com/show/lkl/date/2006-10-09/segment/01>.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: September 22, 2025

/s/ Katherine M. Bolger
Katherine M. Bolger (*pro hac vice*)